

## **EXHIBIT 8**



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**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ROY STEWART MOORE, et al.,

Plaintiffs,

v.

Index No. 19 Civ. 4977 (ALC)

SACHA BARON COHEN, et al.,

Defendants.

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**CONFIDENTIAL**

**REMOTE VIDEO DEPOSITION BY VIDEOCONFERENCE**

**TODD LEWIS SCHULMAN**

**TAKEN ON  
THURSDAY, JANUARY 14, 2021  
12:36 P.M.**

**LOS ANGELES, CALIFORNIA**

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2

3 PAGE 12 LINE 24

4 Q. Was that a show where he would trick people  
5 interviews as he as in the recent past?

6

7 PAGE 31 LINE 23

8 Q. And that demand was just simply ignored,

9

10 PAGE 32 LINE 7

11 Q. Who at Showtime and CBS, if anyone, was  
12 communicated with concerning whether the interview of  
13 Moore would ultimately be aired after they were notified  
14 that Judge Moore considered it to be defamatory?

15

16 PAGE 53 LINE 3

17 Q. So that was a title that you used to lure  
18 to be interviewed --

19

20 PAGE 53 LINE 23

21 Q. In fact, branding Judge Moore as a pedophile  
22 not branding him as a modern American icon, is it?

23

24

25

1 CERTIFIED QUESTIONS CONTINUED

2

3 PAGE 54 LINE 16

4 Q. In fact, branding Judge Moore as a pedophile  
5 not branding him as a modern American icon, is it?

6

7 PAGE 57 LINE 20

8 Q. Judge Roy Moore was the primary target of  
9 Baron Cohen on the show "Who Is America?", correct?

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2 **REMOTE VIDEO DEPOSITION BY VIDEOCONFERENCE**

3 **TODD LEWIS SCHULMAN**

4 **TAKEN ON**

5 **THURSDAY, JANUARY 14, 2021**

6 **12:36 P.M.**

7  
8 **THE VIDEOGRAPHER:** We are on the record.

9 The time is 12:36 p.m., Pacific Standard Time. This  
10 is the beginning of the deposition of Todd Schulman.  
11 The case caption is Moore vs. Cohen. Will Counsel  
12 please introduce yourselves and state who you  
13 represent?

14 **MR. KLAYMAN:** Larry Klayman. I represent  
15 Judge Roy Moore and his wife, Kayla Moore, the  
16 Plaintiffs, and with me is Melissa Isaak, who is the  
17 attorney who is of counsel to me and counsel to the  
18 Moores.

19 **MS. STROM:** Rachel Strom with Davis Wright  
20 Tremaine. I represent the Defendants, and in this  
21 deposition I represent Todd Schulman, the deponent.  
22 With me is Eric Feder, also of Davis Wright  
23 Tremaine.

24 **THE VIDEOGRAPHER:** All right. The court  
25 reporter will now swear in the witness.

1           **THE REPORTER:** All right, Counsel, and  
2 because this is being conducted remotely and this is  
3 a new witness, I do have to make my statement once  
4 again. I'd just like to stipulate for the record  
5 the testimony will be -- and swearing in will be  
6 captured remotely by a professional digital reporter  
7 and all present agree to this method of preserving  
8 today's record. The testimony will be transcribed  
9 and certified. Mr. Klayman, do you agree, sir?

10           **MR. KLAYMAN:** Yes, I just want to confirm  
11 that this is being videoed, as well as transcribed.

12           **THE VIDEOGRAPHER:** Correct.

13           **THE REPORTER:** That is correct, sir. And  
14 Ms. Strom, do you agree, ma'am?

15           **MS. STROM:** I do agree, thank you.

16           **THE REPORTER:** And I'm assuming Ms. Isaak  
17 and Feder, also, as well?

18           **MR. FEDER:** Yes, sir.

19           **THE REPORTER:** Thank you.

20           **MR. KLAYMAN:** Mr. Schulman, will you  
21 please state your full name?

22           **MR. SCHULMAN:** Todd Lewis Schulman.

23           **MR. KLAYMAN:** When were you born?

24           **THE REPORTER:** I apologize, Counsel. I  
25 just realized that after the agreement I did not ask

1 the witness to raise his right hand.

2 **MR. KLAYMAN:** Oh, okay.

3 **THE REPORTER:** My mistake. Mr. Schulman,  
4 could I please have you raise your right hand? Do  
5 you solemnly swear or affirm, under the penalty of  
6 perjury, that you are Todd Schulman and that the  
7 testimony you're about to provide will be the truth,  
8 the whole truth and nothing but the truth?

9 **THE WITNESS:** I do.

10 **THE REPORTER:** Thank you. You may  
11 proceed, Counsel.

12 **TODD LEWIS SCHULMAN**, having been duly sworn, was  
13 examined, and testified as follows:

14 **EXAMINATION**

15 **BY MR. KLAYMAN:**

16 **Q. Will you please state your full name?**

17 A. Todd Lewis Schulman.

18 **Q. When were you born, Mr. Schulman?**

19 A. March 26th, 1979.

20 **Q. Run us briefly through your educational**  
21 **background from high school and up.**

22 A. I -- do you want me to tell you where I  
23 went to school?

24 **Q. Yes. Where -- let's start with where were**  
25 **you born?**

1 answer. That goes beyond the scope, calls for  
2 attorney-client privileged information and goes way  
3 beyond the scope of today's deposition. Do not  
4 answer that, Todd.

5 **MR. KLAYMAN:** Certify it.

6 **BY MR. KLAYMAN:**

7 **Q. Who at Showtime and CBS, if anyone, was**  
8 **communicated with concerning whether the interview**  
9 **of Judge Moore would ultimately be aired after they**  
10 **were notified that Judge Moore considered it to be**  
11 **defamatory?**

12 **MS. STROM:** Objection. This goes beyond  
13 the scope of the deposition topics today.

14 **BY MR. KLAYMAN:**

15 **Q. You can respond.**

16 **MS. STROM:** Objection, don't answer, Todd.  
17 This is beyond the scope.

18 **MR. KLAYMAN:** All right, certify it.

19 **BY MR. KLAYMAN:**

20 **Q. Yerushalayim TV was owned by Greenpark**  
21 **Television, correct?**

22 **A. Correct.**

23 **Q. And Greenpark Television was owned by La**  
24 **Quinta Entertainment, LLC, correct?**

25 **A. Correct.**

1 Q. And La Quinta Entertainment, LLC was owned  
2 by Please You Can Touch, LLC, correct?

3 A. Correct.

4 Q. And Sacha Baron Cohen is the owner of all  
5 of those corporations?

6 A. Correct.

7 Q. Has Greenpark TV gone out of existence?

8 A. I do not know.

9 Q. Has La Quinta Entertainment, LLC gone out  
10 of existence?

11 A. I do not know.

12 Q. Has Please You Can Touch, LLC gone out of  
13 existence?

14 A. I do not know.

15 Q. Now, the reason why this chain of  
16 corporate ownership was created was to try to  
17 insulate Sacha Baron Cohen from personal liability  
18 if he was ever sued, correct?

19 MS. STROM: Objection to the extent this  
20 is getting into your attempt to prove a fraudulent  
21 scheme or fraudulent intent, but Todd, to the extent  
22 you can answer why these corporations were created,  
23 you can do so if it's -- without getting into that  
24 area of testimony.

25 A. I don't know if that's why these companies